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|   |   |                                    |
|---|---|------------------------------------|
|   | : | UNITED STATES BANKRUPTCY COURT     |
|   | : | FOR THE DISTRICT OF NEW JERSEY     |
| IN RE:                                  | : |                                    |
|   | : | CHAPTER 13                         |
| Mark E. Schrager and Helene R. Schrager | : |                                    |
|   | : | CASE NO. 14-29026-CMG              |
| Debtors                                 | : |                                    |
|   | : | <b>OBJECTION TO MODIFIED PLAN</b>  |
|   | : | <b>(CONFIRMATION HEARING DATE:</b> |
|   | : | <b>May 20, 2015 @ 9:30am)</b>      |

The undersigned, ZUCKER, GOLDBERG & ACKERMAN, LLC, attorneys for Secured Creditor Wells Fargo Bank, N.A., the holder of a Mortgage on the debtor premises at 13 Dobson Road, East Brunswick, NJ 08816, in addition to the objections set forth in its original Notice of Objection hereby further objects to the provision in the Chapter 13 plan that fixes the monthly mortgage payment outside the plan. The normal servicing of the debtors loan will call for the post-petition mortgage payment to be adjusted. The debtors plan makes no provision for this adjustment in violation of 11 U.S.C. 1322 (b) (2).

The Debtors loan matures on July 1, 2018, which is during the period of the Debtors Chapter 13 plan. Therefore, the only right the Debtors have is to satisfy the Secured Creditor's claim, pursuant to 11 U.S.C. 1322 (c) (2). The Debtors' plan impermissibly lists the Secured Claim as "unaffected by the plan".

ZUCKER, GOLDBERG & ACKERMAN, LLC  
ATTORNEYS FOR SECURED CREDITOR  
/s/ **DENISE CARLON**  
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DENISE CARLON

DATED: May 18, 2015

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***THIS IS AN ATTEMPT TO COLLECT A DEBT.  
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.***

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